

EXHIBIT FF

1
2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
4 AT CHARLESTON
5
6

7 JO HUSKEY AND ALLEN HUSKEY, :
8 Plaintiffs, : CASE NUMBER
9 v. : 2:12-cv-05201
10 ETHICON, INC., ET AL., :
11 Defendants. :
12

13 TRANSCRIPT OF TRIAL - DAY TWO

14 AUGUST 25, 2014

15 BEFORE THE HONORABLE **JOSEPH R. GOODWIN**,
16 UNITED STATES DISTRICT JUDGE
17

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-GUELCHER - DIRECT - WALLACE

1 and it becomes more brittle, so it's -- then it's like a hard,
2 rigid plastic. It's hard, it's rigid, it cracks. That's what
3 we mean by "embrittlement."

4 Q. Do you have an opinion on whether polypropylene becomes
5 embrittled inside the human body?

6 A. Yes. So, the consequence of this response to the
7 foreign-body reaction is embrittlement. That's one
8 consequence, that's one response.

9 Q. Do you have an opinion on whether polypropylene suffers
10 from a loss of flexibility inside the human body as a result
11 of embrittlement?

12 A. Yes. So, loss of flexibility would happen when it
13 becomes brittle. It's no longer compliant or stretchable.

14 Q. We talked earlier about antioxidants.

15 MR. WALLACE: Can we go to the next slide?

16 MR. THOMAS: Yes.

17 BY MR. WALLACE:

18 Q. Can you explain to the jury the reason for this slide?

19 A. So, as I mentioned before, because of the susceptibility
20 of reactivity of polypropylene with oxygen, we have to add
21 antioxidants. And these are typically packaged as primary and
22 secondary antioxidants, and this technology, again, was worked
23 out largely in the 1960s.

24 So, what do I mean by "primary" and "secondary"? Well,
25 a primary antioxidant is one that is intended to protect it